

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

WILHELMINA REUBEN-COOKE

Plaintiff,

v.

**BOARD OF TRUSTEES OF THE
UNIVERSITY OF THE DISTRICT
OF COLUMBIA, *et al.*,**

Defendants.

Civil Action No. 1:08cv1102

Hon. Leone M. Brinkema

Hon. Ivan D. Davis

**DEFENDANTS BOARD OF TRUSTEES OF THE UNIVERSITY OF THE DISTRICT
OF COLUMBIA AND STANLEY JACKSON AMENDED PRETRIAL DISCLOSURES
PURSUANT TO FED. R. CIV. P. 26(a)(3), LIST OF TRIAL WITNESSES,
STIPULATIONS, AND LIST OF TRIAL EXHIBITS**

Pursuant to Fed. R. Civ. P. 16(d) and 26(a)(3), and the Orders filed January 6, and February 18, 2009, Defendants Board of Trustees of the University of the District of Columbia ("Board"), and Stanley Jackson (collectively, "UDC Defendants"), by and through counsel, respectfully supplement their initial pretrial disclosures and submit their submit their lists of trial witnesses and exhibits and stipulations as follows.

I. Potential Witnesses

A. UDC Defendants Expect to Call the Following Persons to Testify at Trial

1. Earl Cabbell

3831 Rodman Street, NW
Unit 25-A
Washington, D.C. 20016
(202) 363-4777

2. William Divello

District of Columbia
Office of the Inspector General
717 14th Street, Northwest
Washington, D.C. 20005
(202) 727-2540

3. James Dyke, Jr.

McGuire Woods LLP Partner
1750 Tysons Boulevard
Suite 1800
McLean, Virginia 22102-4215
(703) 712-5449

5. Carlynn Fuller

1127 Abbey Place, Northeast
Washington, D.C. 20008
(202) 543-2847

7. Barbara Jumper

6218 29th Street Northwest
Washington, D.C. 20005

University of the District of Columbia
Van Ness Campus
Building 39, Room 301P
4200 Connecticut Avenue, Northwest
Washington, D.C. 20008
(202) 274-5140

9. Lesley Richards, PhD.

609 Q Street, NW
Washington, D.C. 20008

University of the District of Columbia
Van Ness Campus
Building 39, Room 301A
4200 Connecticut Avenue, NW
Washington, D.C. 20008
(202) 274-5100

4. Cheryl Ferraro

District of Columbia
Office of the Inspector General
717 14th Street, Northwest
Washington, D.C. 20005
(202) 727-2540

6. Stanley Jackson

C/o UDC Defendants' Counsel
Phone c/o Thomas Koger: (202) 727-4170
Fax c/o Thomas Koger: (202) 741-5908

8. Bertha D. Minus

9 Alexandria Drive
Oxon Hill, MD 20745-1002

Associate Provost for Academic Affairs
University of the District of Columbia
Building 39, Room 301M
4200 Connecticut Avenue, Northwest
Washington, D.C. 20008
(202) 274-5557

10. David Watts

1629 Webster Street, Northwest
Washington, D.C. 20011

University of the District of Columbia
Van Ness Campus
Building 39, Room 301Q
4200 Connecticut Avenue, NW
Washington, D.C. 20008
(202) 274-5400

B. UDC Defendants May Call the Following Persons to Testify at Trial if Necessary

11. Jonetta Rose Barras

C/O Examiner.com Defendants' Counsel

12. David Patrick Gragan

4849 Connecticut Avenue, Northwest
Washington, D.C. 20008
(703) 395-9792

D.C. Office of Contracting and Procurement
One Judiciary Square
441 4th Street, Northwest, Suite 700 S
Washington, D.C. 20001

13. Sydney Hall

1433 Iris Street Northwest
Washington, D.C. 20010
(202)-722-4212

14. Mary Ann Harris

University of the District of Columbia
Van Ness Campus
Building 39, Room 301A
4200 Connecticut Avenue, Northwest
Washington, D.C. 20008
(202) 274-5100

15. Wilmer L. Johnson

3301 Beret Lane
Silver Spring, MD 20906
(Phone N/A)

16. Johnnie A. Landon, Jr.

4401-A Connecticut Ave. Northwest, Suite 286
Washington, DC 20008
(202) 434-4589

17. Bill Myers

C/O Examiner.com Defendants' Counsel

18. William Pollard

8738 Preston Place
Chevy Chase, MD 20815
(Phone N/A)

19. Herman T. ("Terry") Prescott II

University of the District of Columbia
Van Ness Campus
Building 39, Room A14
4200 Connecticut Avenue, NW
Washington, DC 20008
(202) 274-5311

20. Edmund Cooke

c/o Plaintiffs' counsel

21. Wilhelmina Reuben-Cooke

c/o Plaintiffs' Counsel

22. Thomas M. Berger

Chief Financial Officer
University of the District of Columbia
Building 39
4200 Connecticut Avenue, NW
Washington, DC 20008
(202) 641-7830

**23. Any physician or care provider identified
plaintiff in her Initial Disclosures or
responses to interrogatories herein,
or whose records relating to care and
treatment of plaintiff have been
produced herein,**

UDC Defendants reserve the right to call any witness listed by plaintiff or by any other defendant in their respective submissions pursuant to Fed. R. Civ. P. 26(a)(3), whether or not actually called by plaintiff or by any other defendant to testify at trial and further reserve the

right to call any person for purposes of impeachment or rebuttal. UDC Defendants further reserve the right to call a custodian of records or other appropriate witness to testify to the authenticity, reliability and/or admissibility of documents identified herein if required by objection by plaintiff or by other defendants to same.

III. Witnesses Whose Testimony UDC Defendants May Present by Deposition Pursuant to Fed. R. Civ. P. 26(a)(3)(B)

The UDC Defendants may present testimony of the following persons by deposition, pursuant to do Fed. R. Civ. P. 26(a)(3)(B):

1. James Dyke, Jr.

McGuire Woods LLP Partner
1750 Tysons Boulevard
Suite 1800
McLean, Virginia 22102-4215
(703) 712-5449

2. Wilhelmina Reuben-Cooke

C/o Plaintiff's Counsel

3. Carlynn Fuller

1127 Abbey Place, Northeast
Washington, D.C. 20008
(202) 543-2847

4. Stanley Jackson

C/o UDC Defendants' Counsel

Phone c/o Thomas Koger: (202) 727-4170
Fax c/o Thomas Koger: (202) 741-5908

5. Barbara Jumper

6218 29th Street Northwest
Washington, D.C. 20005

6. Bertha D. Minus

9 Alexandria Drive
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(202) 274-5140

Associate Provost for Academic Affairs
University of the District of Columbia
Building 39, Room 301M
4200 Connecticut Avenue, Northwest
Washington, D.C. 20008
(202) 274-5557

7. Lesley Richards, PhD.

609 Q Street, NW
Washington, D.C. 20008

8. Jonetta Rose Barras

C/O Examiner.com Defendants' Counsel

University of the District of Columbia
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Building 39, Room 301A
4200 Connecticut Avenue, NW

Washington , D.C. 20008
(202) 274-5100

9. David Patrick Gragan
4849 Connecticut Avenue, NW
Washington, D.C. 20008
(703) 395-9792

10. Bill Myers
C/O Examiner.com Defendants' Counsel

D.C. Office of Contracting and Procurement
One Judiciary Square
441 4th Street, NW, Suite 700 S
Washington, D.C. 20001

11. Herman T. ("Terry") Prescott II
University of the District of Columbia
Van Ness Campus
Building 39, Room A14
4200 Connecticut Avenue, NW
Washington , DC 20008
(202) 274-5311

12. Edmund Cooke
c/o Plaintiffs' counsel

UDC Defendants reserve the right to present testimony by deposition of other witnesses in response to any such testimony presented by plaintiff or other defendants, or for impeachment or rebuttal.

III. Stipulations of Fact

The parties have entered into the following stipulations:

A. Plaintiffs' "Public Official" Status as to Examiner.com Defendants

Plaintiff Wilhelmina Reuben-Cooke ("plaintiff") and Defendants Examiner.com, Bill Myers, and Jonetta Rose Barras (collectively, the "Examiner defendants"), hereby stipulate and agree as follows:

1. For purposes of this case, plaintiff is a "public official" as that term is used by *New York Times Co. v. Sullivan*, 376 U.S. 254 (1964), and its progeny.
2. As a result, to establish liability against any of the Examiner defendants, plaintiff will need to prove that such Examiner defendant published the

articles and columns challenged in her Second Amended Complaint with "actual malice," as that term has been defined by, and as required by, *New York Times Co. v. Sullivan*, and its progeny.

B. Plaintiff's "Public Official" Status as to UDC Defendants

Plaintiff Wilhelmina Reuben-Cooke ("plaintiff") and Defendants Board of Trustees of the University of the District of Columbia and Stanley Jackson (collectively, the "UDC defendants"), hereby stipulate and agree as follows:

1. For purposes of this case, plaintiff is a "public official" as that term is used by *New York Times Co. v. Sullivan*, 376 U.S. 254 (1964), and its progeny.
2. As a result, to establish liability against any of the UDC defendants under Count I (Defamation/Defamation *Per Se*), plaintiff will need to prove that such UDC Defendants published the remarks challenged by plaintiff in her Second Amended Complaint with "actual malice," as that term has been defined by, and as required by, *New York Times Co. v. Sullivan*, and its progeny.
3. This stipulation is consistent with that between plaintiff and defendants Examiner.com, Jonetta Rose Barras, and Bill Myers in this matter, Doc. 62, and is intended to have equal effect therewith.

IV. UDC Defendants' List of Trial Exhibits

UDC Defendants may use all exhibits listed in Attachment A.

Respectfully submitted,

/s/: Thomas L. Koger

Thomas L. Koger, VA Bar No. 40086

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Office of the Attorney General

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Senior Assistant Attorney General
Equity I Section
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(202) 727-3625 Facsimile

*Counsel for Defendants, Board of Trustees of the
University of the District of Columbia and Stanley
Jackson*

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of April, 2009, I will electronically file the foregoing Defendants Board Of Trustees Of The University Of The District Of Columbia And Stanley Jackson Pretrial Disclosures Pursuant To Fed. R. Civ. P. 26(A)(3), List Of Trial Witnesses, Stipulations, And List Of Trial Exhibits with the Clerk of Court using the CM/ECF system and thereby cause a Notification of Electronic Filing to be served upon the following filing users:

Elaine Charlson Bredehoft
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Counsel for Plaintiff,
Wilhelmina Reuben-Cooke

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John O'Keefe, Esq. iokeefe@lskslaw.com
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Levine Sullivan Koch & Schulz, L.L.P.
1050 17th Street NW, Suite 800
Washington, DC 20036-5514
Counsel for Defendants, EXAMINER.COM
Bill Myers and Jonetta Rose Barras

and that I will serve the foregoing this 7th day of April, 2009, by first class mail,
postage prepaid, upon:

Wilmer L. Johnson
3301 Beret Lane
Silver Spring, MD 20906

Johnnie A. Landon, Jr.
4401-A Connecticut Ave., NW, #286
Washington, DC 20008

Sydney Hall
1431 Iris Street, NW
Washington, DC 20012

/s/ Thomas L. Koger
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*Counsel for Defendants, Board of Trustees of the
University of the District of Columbia and
Stanley Jackson*

UDC Defendants' Amended List of Trial Exhibits – Attachment A to UDC Defendants' Pretrial Statement

EXHIBIT NUMBER	BATES NUMBER	DOC TYPE	DOC DESCRIPTION	DOC DATE	CONFIDENTIAL?	OBJECTION
1	PL 00040-44	Record	WRC medical record for Dr. Anthony Watkins.	2007-2008	Yes	
2	PL 00050	Record	WRC medical record from INOVA Health System.	October 29, 2007	Yes	
3	PL 00051-52	Record	WRC medical record for Washington Cardiovascular Specialists.	November 2, 2007	Yes	
4	PL00085-86	Letter	WRC appointment letter.	June 19, 2003	No	
5	PL00088	Agenda	Provost's meeting with the President.	October 5, 2005	No	
6	PL00089-90	Agenda	Provost's meeting with the Senior Vice President and Chief of Staff.	February 26, 2007	No	
7	PL00091-92	Chart	Academic Affairs Additional Funding Requests FY 2007	Revised February 16, 2007	No	
8	PL00105	Agenda	President and Provost meeting on Workforce Development and Community College Programs.	January 10, 2006	No	
9	PL00119-124	Proposal	UDC Proposed Expansion of Workforce Development Training and Community College Programs in D.C.	September 14, 2005	No	
10	PL00147	Agenda	Provost Meeting with the President: McKinley Tech, Academic Affairs Lapsed Funding, et cetera.	April 14, 2006	No	
11	PL00149	Memo	From Rolin Sidwell to WRC regarding various use agreements.	February 9, 2006	No	
12	PL00160	Application	Application to use facilities at McKinley.	June 29, 2006	No	

UDC Defendants' Amended List of Trial Exhibits – Attachment A to UDC Defendants' Pretrial Statement

13	PL00161-162	Applicant	Application to use facilities at Ferebee-Hope.	August 7, 2006	No	
14	PL00163-164	Applicant	Application to use facilities at Woodson.	April 25, 2006	No	
15	PL00170-173	Chart	UDC Workforce Development Community Programs Schedule of Salaries and Benefits.	October 1, 2006 thru September 30, 2007	No	
16	PL00174	Chart	UDC Workforce Development Program organization chart.	Updated November 7, 2006	No	
17	PL00175-177	Memo	From WRC to Dr. Pollard concerning the decision about whether to offer a certified nursing assistant program at Ferebee Hope.	January 19, 2006	No	
18	PL00241-249	Plan	UDC Workforce Development Initiative Woodson Satellite Program.	April 20, 2007	No	
19	PL00257-263	Agenda/Notes	UDC Workforce Satellite Centers Planning Meeting and handwritten notes.	September 12, 2007	No	
20	PL00279-282	Report	UDC Satellite Programs report (background, goals, strategies, outcomes).	March 1, 2007	No	
21	PL00298-300	Email	From Terry Prescott to Dr. Pollard regarding the preliminary cost of UDC Ward 8 Learning Communities Cost for Fall 2005.	July 20, 2005	No	
22	PL00354-355	Response	Response to statements of Jonetta Rose Barras regarding Workforce Development Program.		No	
23	PL00473	Agenda	Board of Trustees Academic Affairs	July 5, 2007	No	

UDC Defendants' Amended List of Trial Exhibits – Attachment A to UDC Defendants' Pretrial Statement

				Committee Meeting: Academic Policies, Salary Increases, Outreach Strategies, et cetera.			
24	PL00512	Agenda		Provost's meeting with the Senior Vice President.	May 31, 2007	No	
25	PL00513-515	Agenda		Meeting with the President (FY 2008 Budget Call, Title III, Convocation, Faculty Promotion, etc.).	September 11, 2007, Continued September 17, 2007	No	
26	PL00522-526	Agenda		Provost's meeting with Senior Vice President (conversation with the Chair, FY 2007 Academic Affairs Funding Requests, Dean's Requests, etc.). <i>Additionally: Academic Affairs request to use a portion of FY 2007 lapsed funding. Revised June 6, 2007</i>	June 28, 2007	No	
27	PL00539-00541	Agenda		Provost's meeting with the President. <i>Additionally: Academic Affairs request to use a portion of FY 2007 lapsed funding. May 31, 2007</i>	May 31, 2007	No	
28	PL00542	Agenda		Provost's meeting with the President. Include University Senate resolutions, budget memo, and workforce development leadership.	May 7, 2007	No	
29	PL00544-545	Chart		Academic Affairs Additional Funding Requests FY 2007.	Revised April 27, 2007	No	
30	PL00546	Memo		From WRC to Dr. Pollard pertaining to a second staff assistant position in	April 27, 2007	No	

UDC Defendants' Amended List of Trial Exhibits – Attachment A to UDC Defendants' Pretrial Statement

				the Office of the Provost.			
31	PL00547-548	Memo		From WRC to Dr. Pollard regarding additional FY 2007 budgetary funding to Academic Affairs.	April 27, 2007	No	
32	PL00549	Agenda		Provost's meeting with the Senior Vice President. Includes FY 2007 funding requests, dean's requests and other issues.	June 28, 2007	No	
33	PL00550-551	Chart		Academic Affairs request to use a portion of FY 2007 lapsed funding.	Revised June 6, 2007	No	
34	PL00552-553	Chart		Academic Affairs Additional Funding Requests. FY 2007	Revised April 27, 2007	No	
35	PL00554-555	Chart		Academic Affairs Additional Funding Requests FY 2007 with handwritten notes.	Revised April 27, 2007	No	
36	PL00556	Agenda		Provost's meeting with the Senior Vice President.	June 14, 2007	No	
37	PL00557-558	Chart		Academic Affairs request to use a portion of FY 2007 lapsed funding.	June 6, 2007	No	
38	PL00559	Chart		Academic Affairs request to use a portion of FY 2007 Lapsed Funding.	May 31, 2007	No	
39	PL00560	Request Form		Reprogramming request form for Workforce Development. Requestor Rolin Sidwell.	October 16, 2006	No	
40	PL00561	Agenda		Provost meeting with the President.	April 14, 2006	No	
41	PL00859	Email		From WRC to WRC forwarding email Dr. Pollard regarding transition and Provost sabbatical.	Original email: June 29, 2007 Forward: November 8, 2007	No	

UDC Defendants' Amended List of Trial Exhibits – Attachment A to UDC Defendants' Pretrial Statement

42	PL00898	Email/ Statement	WRC email to WRC containing Stanley Jackson's statement.	Statement: October 26, 2007 Email: October 31, 2007	No	
43	PL 00965- 1007	Notes	Handwritten physician's notes pertaining to WRC's health conditions.	2009	Yes	
44	EX00001	Article	Examiner.com, "UDC to return \$18M in unused funds to District"	October 22, 2007	No	
45	EX00002	Article	Examiner.com, "Top UDC official mishandled millions"	October 24, 2007	No	
46	EX00003	Article	Examiner.com, "The University of D.C. is ripe for reform"	October 25, 2007	No	
47	EX00004-5	Article	Examiner.com, "UDC leaders request staff shake-up"	October 29, 2007	No	
48	JB00043- 44	Chart	UDC Payroll Information Manning Chart.	April 2, 2008	No	
49	BM00001 -4	Memo	From University Senate Steering Committee to Mayor Fenty requesting help with the debilitating state of affairs at UDC.	September 27, 2007	No	
50	BM00006 -7	Letter	From Sydney Hall to Fernando Barrueta, Chair of the Facilities Committee regarding the bldg. 52 renovation.	April 25, 2007	No	
51	BM00181 -191	Report	UDC Independent Auditor's Report on Internal Control Over Financial Reporting and on Compliance and Other Matters.	September 30, 2005	No	

UDC Defendants' Amended List of Trial Exhibits – Attachment A to UDC Defendants' Pretrial Statement

52	WRCA 00089	Email	From Sidwell to Johnnie Landon, Mutnick, Dwayne Jones, and Leroy Shields pertaining to requisitions.	No	
53	WRCA 00178- 00179	Email	Between Rolin Sidwell and Leroy Shields pertaining to the Friendship-Edison building lease.	No	February 6, 2007
54	WRCA 00196	Memo	Memo to Ms. Reuben-Cooke regarding a status report on agreements to use space in facilities for UDC's satellite workforce development programs.	No	February 23, 2006
55	WRCA 00209- 212	Applicat ion	To use facilities at McKinley Tech.	No	September 15, 2006
56	WRCA 00215- 216	Memo	Memo of understanding for Intra-District Funding.	No	May 2, 2007
57	WRCA 00249	Memo	To Ms. Reuben-Cooke regarding status report on agreements to use space at UDC's satellite sites.	No	February 23, 2006
58	WRCA 00250	Memo	To Ms. Reuben-Cooke concerning the engagement of Council members, members of the Board of Ed., senior DC government officials, community leaders, and organizations.	No	February 9, 2006
58	WRCA 00275- 281	Email	Dwayne Jones, Sr.: Pertaining to available, but not accessible, funds regarding Workforce Development Acquisition Requirements from	No	August 15, 2006

UDC Defendants' Amended List of Trial Exhibits – Attachment A to UDC Defendants' Pretrial Statement

				Wossen Encubahre.			
60	WRCA 00520- 521	Agreement		UDC DOH Inter-agency agreement.	FY 2006	No	
61	WRCA 00522	Memo		From Prescott to Robinson pertaining to Workforce Development budget for public safety and emergency management.	June 23, 2006	No	
62	WRCA 00753- 754	Talking Points		Vest Appropriation: WRC Provost and VP for AA.	December 6, 2005	No	
63	WRCA 00769	Memo		From WRC to Dr. Pollard pertaining to decision about whether to offer certified nursing assistant program at Ferebee Hope.	January 19, 2006	No	
64	WRCA00 942	Memo		RE: Workforce Development.	June 19, 2006	No	
65	WRCA 01101- 01108	Letter		Letter and personnel information pertaining to Jackson's position as Senior VP and Chief of Staff.	2007	No	
66	WRCA 01109- 01110	Letter		From Pollard to Jackson regarding Jackson's salary.	December 22, 2006	No	
67	WRCA 01211	Letter		From David Watts to Elaine Bredehoft concerning WRC's letter of appointment.	January 23, 2008	No	
68	WRCA 01212	Letter		From Stanley Jackson to WRC regarding termination of Executive Appointment.	December 7, 2007	No	
69	WRCA	Letter		WRC appointment letter.	June 18, 2003	No	

UDC Defendants' Amended List of Trial Exhibits – Attachment A to UDC Defendants' Pretrial Statement

	01230-1231						
70	WRCA 01252-1253	Letter	WRC amended appointment letter.	July 18, 2003	No		
71	WRCA 01365-1379	Testimony	Testimony of Stanley Jackson to the Committee of the Whole.	February 27, 2008	No		
72	WRCA 01380-1389	Audit/ List	Audit of the Workforce Development Program of UDC, showing purchase orders. Note both EXCESSIVE and WASTE expenditures (constitutes 21 out of 55 of the purchase orders).	2007	No		
73	WRCA 01856-1858	Audit	OIG 07-2-33GG Workforce Development Program to document meeting with Mary Ann Harris (manager of the Procurement and Contracting Office at UDC). Auditor: Khaled Abdel Ghany.	September 27, 2007	No		
74	WRCA 01860-1879	Audit	OIG 07-2-33GG Workforce Development Program to document Terry Prescott (Exec. Assistant for the Provost). Auditor: Khaled Abdel Ghany. See attachments for versions of Academic Affairs budgets.	September 26, 2007	No		
75	WRCA 01895-1896	Audit	To document email received from Dr. Sidwell on December 27, 2007.	December 31, 2007	No		
76	WRCA	Audit	To document email from Dr. Sidwell	January 18,	No		

UDC Defendants' Amended List of Trial Exhibits – Attachment A to UDC Defendants' Pretrial Statement

	01898-1899		regarding organizational chart for WDP.	2008		
77	WRCA 01934-1947	Audit	OIG 07-2-33GG Workforce Development Program to document interview with the CFO Mrs. Barbara Jumper. Auditor: Khaled Abdel Ghany. See attachment for list of employees and salaries. OIG 07-2-33GG Workforce Development Program to document obtaining the status of 37 purchase orders for WDP. Auditor: Khaled Abdel Ghany.	December 12, 2007 & December 18, 2007	No	
78	WRCA 02206-2207	Memo	From David Rose to WRC pertaining to first quarter fiscal year 2007 invoice.	January 15, 2007	No	
79	WRCA 02213-2214	Memo	From Samuel Barrington to WRC pertaining to third quarter fiscal year 2007 invoice.	July 31, 2007	No	
80	WRCA 02215-2216	Memo	From Samuel Barrington to WRC pertaining to fourth quarter fiscal year 2007 invoice.	October 15, 2007	No	
81	WRCA 02225-2226	Memo	From David Rose to WRC and Clemmie Solomon pertaining to first quarter fiscal year 2007 invoice.	January 10, 2007	No	
82	WRCA 02588-2589	Memo	From Vantresse McMillan (Special OIG Agent) to Alfred Miller (Interim Assistant IG) regarding closing the Reuben-Cooke file based on the	May 30, 2008	No	

UDC Defendants' Amended List of Trial Exhibits – Attachment A to UDC Defendants' Pretrial Statement

				notion that Reuben-Cooke had been reassigned to a faculty position.			
83	WRCA 02606	Memo		Memo of interview with Shelley Broderick.	May 6, 2008	No	
84	WRCA 02634-02638	Form		Personnel Action form for WRC.	2003	No	
85	WRCA 02662	Memo		Memorandum of interview with Carlynn Fuller interview with Special Agent Hosenbackez.	April 8, 2008	No	
86	WRCA 02674-2759	Audit		Audit of the Workforce Development Program at UDC by Charles Willoughby, Inspector General.	July 9, 2008	No	
87	WRCA 02762	Letter		From IG Willoughby to Stanley Jackson confirming the start of a Workforce Development audit.	September 13, 2007	No	
88	WRCA 02766	Letter		From Stanley Jackson to IG Willoughby requesting an audit of WDP.	September 7, 2007	No	
89	WRCA 03244, 3245, 3249	Forms		Reprogramming Request Forms	Various	No	
90	WRCA 03249A	Chart		Community Outreach and Extension Services Workforce Development FY 07 Budget vs. Expenditures Report.	2007	No	
91	WRCA 03720,	Chart		Time and Attendance Report.	March 2008-June 2008	No	

UDC Defendants' Amended List of Trial Exhibits – Attachment A to UDC Defendants' Pretrial Statement

	03724, 03732, 03742-45						
92	WRCA 03883- 3908	Report	UDC financial statements and management's discussion and analysis.	September 30, 2007 and 2006	No		
93	WRCA 04841- 4921	Report	A15- OIG Audit of the WDP, Final Report.	July 9, 2008	No		
94	WRCA 05341- 5356	Report	Annual Report to the Board.	2007	No		
95	WRCA 06205	Email	From Sidwell to WRC regarding personnel actions.	May 12, 2006	No		
96	WRCA 06206	Email	From Sidwell to Deborah Johnson pertaining to an expenditure report.	June 13, 2007- June 27, 2007	No		
97	WRCA 06212	Email	From Sidwell to various individuals, including WRC, Prescott, and Wyche- Moore pertaining to final spring class rosters and beginning summer rosters.	June 8, 2007	No		
98	WRCA 07007- 07021	Hearing/ Testimo ny	Public Oversight Hearing on UDC. Testimony of Stanley Jackson.	November 27, 2007	No		
99	WRCA 07022- 7029	Routing Slip	UDC OCP: Procurement Actions.	2005-2007	No		
100	WRCA 07030- 7035	Fax	Contracting Officer's final decision. Purchase and Install of Modular Trailers- VOID.	November 6, 2007	No		
101	WRCA	Memo	Watts to Jackson regarding Intelsat	June 12, 2007	No		

UDC Defendants' Amended List of Trial Exhibits – Attachment A to UDC Defendants' Pretrial Statement

	07036		Lease.				
102	WRCA 07727- 7732	CV	WRC's CV.		No		
103	WRCA 09562- 9576	Report	Independent Auditor's Report on Internal Control Over Financial Reporting and on Compliance and Other matters Based on an Audit of Financial Statements Performed in Accordance with Government Auditing Standards. Note: Schedule of revenues, expenses, and changes in net assets is included therein.	February 2, 2007	No		
104	WRCA 09991	DVD/cd	Compilation disk of DC Council Hearings. This disk has five folders, each containing computer media files. The hearing dates correspond as follow: Disk 1 = 3/13/07 Oversight Hearing Disk 2 = 3/27/07 Budget Hearing Disk 3 = 11/27/07 Public Hearing Disk 4 = 4/11/08 Public Hearing Disk 5 = 2/27/08 Oversight Hearing	2007-2008	No		
105	WRCA 10304- 11196	Briefing Book	UDC Performance Oversight Hearing Briefing Book FY 2007-2008 Budget Stanley Jackson. Includes President Jackson's Transmittal Letter (WRC A 10313), Vincent Gray's Letter (WRC A 10316), Questions & Responses (WRC A 10319), Testimony, and Attachments.	February 15, 2008	No		

UDC Defendants' Amended List of Trial Exhibits – Attachment A to UDC Defendants' Pretrial Statement

				2 Copies of January 2008 Performance Measures Report (WRC A 10325); Employee List + Salary (WRC A 10354); UDC List of Contracts for 07+08 (WRC A 10414); University Organizational Charts (WRC A 10517). The remaining documents deal namely with budget/grant and program analysis.			
106	WRCA 11200-11208	Chart/Memo	Academic Affairs Organizational Charts. Memo from Reuben-Cooke to Vincent Gray pertaining to status update on the development of the UDC satellite campus at Woodson.	July 18, 2007	No		
107	WRCA 11209-11221	Report	Provosts' Status Report to D.C. Council Chair Vincent Grayre: UDC Woodson High School Satellite Campus	July 18, 2008	No		
108	WRCA 11241-11243	Resolution	University Senate Resolution pertaining to the Vote of No Confidence with regard to the leadership of Pollard and Reuben-Cooke.	2007	No		
109	WRCA 11244-11246	Memo	From UDC Faculty Senate to Acting President Jackson requesting adverse action against Provost	Sept. 14, 2007	No		
110	WRCA 11315-11333	Power Point	UDC FY 2008 Budget Call: Understanding the different components of the university budget.	Undated	No		

UDC Defendants' Amended List of Trial Exhibits – Attachment A to UDC Defendants' Pretrial Statement

111	WRCA 11342	Letter	Stanley Jackson and Barbara Jumper. From Jackson to Leslie Richards re: UDCFA/NEW grievance 07-G-06 and responsibility of Provost to consult per Sixth Master Agmt		No			
112	WRCA 13295- 13304	List	List of UDC Ratifications.	2008	No			
113	WRCA 13308- 13315	Email	Emails from David Gragan (OCP) to other members of OCP, ODCA, COUNCIL, EOM, Jackson, Cabbell, Alston, Maryann Harris, Rosalia Rojas, Steven Greber, Jay Greene.	2008	No			
114	WRCA 14759- 14765	Grievan ce	Jack Martinelli, Associate Professor.	January 9, 2007	Yes			
115	WRCA 14844- 14846	Grievan ce	UDC FA NEA	February 13, 2006	Yes			
116	WRCA 14835- 14923	Grievan ce	UDC FA NEA	October 3, 2006	Yes			
117	WRCA 14867- 14869	Grievan ce	UDC FA NEA on behalf of the faculty.	October 3, 2006	Yes			
118	WRCA 14872- 14874	Grievan ce	UDC FA NEA on behalf of the faculty.	August 24, 2006	Yes			
119	WRCA 14915-	Grievan ce	UDC FA NEA on behalf of the faculty	June 24, 2005	Yes			

UDC Defendants' Amended List of Trial Exhibits – Attachment A to UDC Defendants' Pretrial Statement

	14923						
120	WRCA 14930- 14939	Grievan ce	UDC FA NEA	August 24, 2006	Yes		
121	WRCA 15020- 15023	Grievan ce	UDC FA NEA	March 13, 2006	Yes		
122	WRCA 15612- 15644	NCAA Report	UDC Public Infractions Report	October 29, 2008	No		
123	SU 142, 150-151, 149, 148, 158, 159, 174-175, 172, 173, 165-166, 186, 185, 181, 182, 188, 189, 191	Letters	Between officials at Syracuse University and WRC pertaining to her position.	1993- 2003	No		
124		Summary Chart	Summary/compilation exhibit of Syracuse documents at Exhibit 122	1994 – 2003	No		
125		Email	Between Dyke, Jackson, Watts re: WRC's position as Provost	12/04/2007	Yes		
126		Email	Between Barbara Jumper and Natalie Wilson re: potential publication by Bill Myers of unadjusted UDC financial data	10/27/07	No		

UDC Defendants' Amended List of Trial Exhibits – Attachment A to UDC Defendants' Pretrial Statement

127			OMITTED			
128		Power Point	UDC FY2008 Budget PowerPoint for Jackson/Jumper presentation	11/02/2007	No	
129		Email	From Larry Daniels to WRC, et al. re: WDP roundtable meeting	11/19/2007		
130		Email	From Michael Andrews to Stanley Jackson and others re: UDC-CFO Administrative Orders & Procurement Violations	7/18/07	No	
131		Email	From Encuhahre to Jackson, et al., attached to which were documents defining ratification, listing procurement violators, reflecting procurement policy, and forms	7/18/07	No	
132			Plaintiffs' Responses to Defendant Board of Trustees' First Set of Interrogatories		No	
133			Plaintiffs' Responses to Defendant Examiner.com's First Set of Interrogatories		No	
134			Any exhibit listed by any other party to which an objection is not sustained			

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of April, 2009, I will electronically file the foregoing Defendants Board Of Trustees Of The University Of The District Of Columbia And Stanley Jackson Amended Pretrial Disclosures Pursuant To Fed. R. Civ. P. 26(A)(3), List Of Trial Witnesses, Stipulations, And List Of Trial Exhibits with the Clerk of Court using the CM/ECF system and thereby cause a Notification of Electronic Filing to be served upon the following filing users:

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and that I will serve the foregoing this 7th day of April, 2009, by first class mail, postage prepaid, upon:

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